

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YASMIN MOHAMED p/k/a YASMINAH,

Plaintiff,

v.

REPUBLIC RECORDS, et al.,

Defendants.

Case No. 1:18-cv-08469-JSR

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Thomas Bangalter dated November 17, 2018, with attachment, and the Declaration of Guillaume Emmanuel Homem Christo dated November 17, 2018, Thomas Bangalter and Guillaume Emmanuel Homem Christo (sued erroneously as “Guillaume Emmanuel de Homem-Christo”), by and through their attorneys, will move this Court, before the Honorable Jed S. Rakoff, at the United States District Courthouse, Courtroom 14-B, 500 Pearl Street, New York, New York 10007, for an Order (1) dismissing the Complaint filed by Plaintiff Yasmin Mohamed as against Messrs. Bangalter and Homem Christo pursuant to Fed. R. Civ. P. 12(b)(2); (2) dismissing the action pursuant to Fed. R. Civ. P. 12(b)(3) or transferring the action to the United States District Court for the Central District of California pursuant to 28 U.S.C. § 1404(a); and/or (3) dismissing Count Four of the Complaint as against Messrs. Bangalter and Homem Christo under Fed. R. Civ. P. 12(b)(6), and granting such other further relief as the Court may deem just and proper.

Pursuant to the Court’s Case Management Plan entered November 8, 2018, ECF No. 51, answering papers shall be filed and served by December 7, 2018, reply papers shall be filed and served by December 14, 2018, and oral argument is to be held on December 19, 2018 at 3:30 P.M.

Dated: November 19, 2018

Respectfully submitted,

/s/ **Sandra A. Crawshaw-Sparks**

Sandra A. Crawshaw-Sparks

Charles B. Ortner

PROSKAUER ROSE LLP

Eleven Times Square

New York, New York 10036

(212) 969-3915

SCrawshaw@proskauer.com

Attorneys for Defendants Guillaume

Emmanuel Homem Christo and Thomas

Bangalter p/k/a Daft Punk